

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION

21 MC 100 (AKH)

THIS DOCUMENT RELATES TO ALL
CASES

**NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER COMPELLING CERTAIN
UNITED STATES SOCIAL SECURITY ADMINISTRATION OFFICES
TO RESPOND TO SUBPOENAS DUCES TECUM**

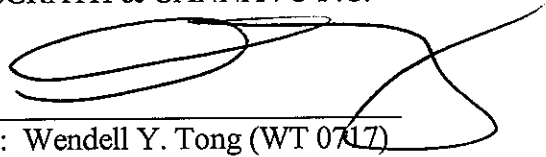
Upon the annexed certification of Wendell Y. Tong, an attorney, dated November 1, 2010 and the exhibits annexed thereto, Plaintiffs will move this Court, the Honorable Alvin K. Hellerstein, United States District Judge, presiding, Room 14D, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007 for an order, pursuant to Rule 45 of the Federal Rules of Civil Procedure: compelling certain local United States Social Security Administration offices to produce “[r]ecords of decision regarding Social Security Disability Insurance and all supporting documents, including: medical records, narrative reports, affidavits, notices of award, claims forms, disability determination, transmittal forms and internal memoranda,” pursuant to duly served subpoenas, and for such other and further relief as this Court deems just and proper.

Jurisdiction and venue are proper under the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 408(b)(3), which grants this Court exclusive jurisdiction over actions brought on claims relating to or arising out of the events of September 11, 2001, and pursuant to the World Trade Center Settlement Process Agreement.

Dated: New York, New York
November 1, 2010

Respectfully submitted,

SULLIVAN PAPAIN BLOCK
McGRATH & CANNAVO P.C.

A handwritten signature in black ink, appearing to read 'Wendell Y. Tong', is written over a horizontal line.

By: Wendell Y. Tong (WT 0717)
Attorneys for Plaintiffs
120 Broadway – 18th Floor
New York, New York 10271
(212) 732-9000

SOCIAL SECURITY ADMINISTRATION OFFICES:

Social Security Administration Office
Oppenheim BLDG - 1st Floor
409 Lackawanna Avenue
Scranton, Pennsylvania 18503

Social Security Administration Office
322 Main Street
Poughkeepsie, New York 12601

Social Security Administration Office
2389 Richmond Avenue
Staten Island, New York 10314

Social Security Administration Office
297 Knollwood Road
Suite 4A
White Plains, New York 10607

Social Security Administration Office
3 Washington Center
Newburgh, New York 12550

Social Security Administration Office
1029 E. 163rd Street
3rd Floor
Bronx, New York 10459

Social Security Administration Office
84 N. Main Street
Freeport, New York 11520

Social Security Administration Office
26 Federal Plaza
New York, New York 10278

Social Security Administration Office
1510 Hylan Boulevard
2nd Floor
Staten Island, New York 10305

Social Security Administration Office
3511 N. Pine Island Road
Sunrise, Florida 33351

Social Security Administration Office
10 Bouck Court
Brooklyn, New York 11223

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STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

WENDELL Y. TONG, being duly sworn, deposes and says:

I am associated with the law firm of SULLIVAN PAPAIN BLOCK MCGRATH & CANNARO P.C., attorneys for the Plaintiffs herein.

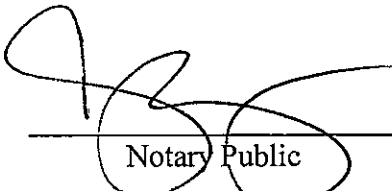
I have read the foregoing Certification and know the contents thereof, and upon information and belief deponent believes the matters alleged therein to be true.

The source of deponent's information and the grounds of his beliefs are communications, papers, reports, and investigations contained in the file.



WENDELL Y. TONG

Sworn to before me this
1st day of November, 2010.



Notary Public

DENISE STRACUZZA
Commissioner Of Deeds, City Of New York
No. 4-6970
Cert. Filed In New York County
Commission Expires 3/11/2011